

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re: ) Chapter 11  
W.R. GRACE & CO., *et al.*, )  
Debtors. ) Case No. 01-1139 (JKF)  
 ) Jointly Administered  
 )  
 ) **Objection Date: November 7, 2005 @ 5:00 p.m. (proposed)**  
 ) **Hearing Date: November 14, 2005 @ 12:00 p.m. (proposed)**

**NOTICE OF MOTION**

TO: All Parties on the Attached List

PLEASE TAKE NOTICE, that on October 21, 2005, the Official Committee of Asbestos Personal Injury Claimants filed and served the attached **Motion for the entry of an order (I) clarifying the Case Management Order for the Estimation of Asbestos Personal Injury Liabilities, or, in the alternative, for modification of the Case Management Order for the Estimation of Asbestos Personal Injury Liabilities** (the “Motion”), with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 5<sup>th</sup> Floor, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE, that any responses to the Motion must be in writing and filed with the Bankruptcy Court on or before **November 7, 2005 at 5:00 p.m.**

PLEASE TAKE FURTHER NOTICE, that at the same time, you must also serve a copy of the response upon the undersigned counsel, so that it is received on or before **November 7, 2005 at 5:00 p.m.**

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: October 21, 2005

CAMPBELL & LEVINE, LLC

*/s/ Mark Hurford*

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Marla R. Eskin (No. 2989)  
Mark T. Hurford (No. 3299)  
800 North King Street, Suite 300  
Wilmington, DE 19801  
(302) 426-1900

-and-

CAPLIN & DRYSDALE, CHARTERED  
Elihu Inselbuch  
399 Park Avenue  
New York, NY 10022-4614  
(212) 319-7125

-and-

CAPLIN & DRYSDALE, CHARTERED  
Peter Van N. Lockwood  
Nathan D. Finch  
One Thomas Circle, N.W.  
Washington, D.C. 20005  
(202) 862-5000

*Counsel to the Official Committee of  
Asbestos Personal Injury Claimants*